

EXHIBIT A
DECLARATION OF CHARLES LEE MUDD JR.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SAI KOPPAKA,)
)
Plaintiff,)
)
v.) No. 1:14-cv-06716
)
JOHN DOE,) The Hon. Joan Gottschall
)
Defendant.)

DECLARATION OF CHARLES LEE MUDD JR.

1. I am an attorney licensed to practice in the States of Illinois, Indiana, Connecticut and Utah.
2. I represent Sai Koppaka (“Plaintiff”) in the above-captioned litigation.
3. Prior to filing the above-captioned litigation, the Plaintiff conducted an investigation into the Defendant’s conduct and sought information that would identify the Defendant.
4. The investigation did not produce any substantial evidence that identified the Defendant by name.
5. Several third parties from whom Mr. Koppaka has received unsolicited electronic mail (“Third Party Sources”) possess information that may lead to the identity of the Defendant.
6. Based upon my experience in litigation involving anonymous parties, it is unlikely that the Third Party Sources will produce documents relating to the Registered Accounts absent a subpoena.
7. Based on the foregoing, absent expedited discovery, the Plaintiff will not be able to identify the Defendant and proceed with the litigation.

8. Based upon my experience in litigation involving anonymous parties and conduct involving the Internet, the information that will tend to identify the Defendant most likely exists in electronic records that may be destroyed if not expeditiously obtained and preserved.

9. Internet Service Providers (“ISPs”) tend to destroy certain information relating to accounts and associated Internet Protocol (“IP”) addresses after thirty (30) days.

10. Some ISPs may destroy information relating to accounts or IP addresses on shorter or longer timetables, as the case may be.

11. However, most ISPs destroy information related to IP addresses after some point in time simply due to the volume of information collected.

12. Expedited discovery is necessary to prevent against the destruction of the information that could identify the Defendant.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: September 12, 2014

A handwritten signature in black ink, appearing to read "CLM".

Charles Lee Mudd Jr.